Dear employees

Dear readers

Vontobel has been recognized for its commitment to excellence, its independent thinking and its strong capital base ever since it was established in 1924. The Code of Conduct summarizes the principles and practices that define the way we do business at Vontobel and that are set out in detail in our guidelines and directives. The rules of conduct defined in the Code of Conduct are binding on all members of the Board of Directors and all employees of Vontobel and form an integral part of their employment contract. Our clients, shareholders, employees, business partners, the authorities and the general public place their trust in us. We are committed to acting ethically, responsibly and with integrity and to being a reliable partner to them at all times. Our good reputation is our most valuable asset. We must safeguard it carefully based on the knowledge that it is the key to our long-term success.

On behalf of the Board of Directors and the Group Executive Management

Herbert J. Scheidt
Chairman of the Board of Directors

Dr. Zeno Staub
Chief Executive Officer

Zurich, December 2017
The Group Code of Conduct

1 Laws and regulations
Vontobel complies with the applicable laws, regulations and leading standards in all the countries in which it operates. In particular, we are committed to supporting efforts to combat money laundering, corruption and the financing of terrorism.

2 Ethical principles
Our relationship with our clients, shareholders, employees, business partners, the authorities and the general public is based on honesty, fairness and transparency. We avoid potential conflicts of interest wherever possible; if they cannot be avoided, we disclose them and address them transparently. We strive to manage our company in a responsible manner.

3 Confidentiality
Vontobel assigns the utmost importance to preserving confidentiality and to exercising due diligence in its work, especially in its relationship with clients. Confidential client data is treated strictly as such and is not disclosed to third parties under any circumstances, unless required by law. We handle confidential data about a company or Vontobel – which is referred to as insider information – in a responsible manner and in accordance with the applicable legislation. This insider information is not used for our own advantage or disclosed to third parties.

4 Transparency
We pledge to provide prompt, complete and comprehensible information to our different stakeholders in accordance with the applicable duties of disclosure. Furthermore, we inform our clients and the general public about other relevant aspects of our business activities.

5 Vontobel as an employer
Vontobel is committed to providing employees with a working environment that offers them long-term career perspectives and equal opportunities in terms of employment and promotion. We cultivate an inclusive corporate culture that is free from discrimination and we strive to foster diversity based on our belief that mixed teams of professionals deliver a better performance. We provide a healthy and secure working environment. Our compensation systems are designed to reward performance and long-term success. By actively encouraging our people and providing a range of training and development measures, we aim to maintain long-term employee motivation.

6 Corporate responsibility and sustainable development
Vontobel assumes its social responsibilities and promotes sustainable development. We are committed to respecting human rights and expect our business partners to do the same. Vontobel supports the community – either directly or by encouraging our employees to volunteer their time to help others. We adopt an environmentally friendly approach in every area of our business, whether it is in terms of the range of products we offer or in our banking operations. At the same time, we ensure that our business partners comply with minimum standards relating to employment conditions and the environment.

Implementation of and compliance with the Vontobel Code of Conduct
This Code of Conduct was approved by the Board of Directors of Vontobel and the Group Executive Management. All employees of Vontobel, its governing bodies and all representatives who act on behalf of Vontobel are expected to comply with the spirit and letter of the rules of conduct defined in the Code of Conduct. It forms an integral part of the employment contract of all employees.

A lack of knowledge of the Code of Conduct or the directives and regulations that define the rules of conduct in greater detail shall not be accepted as grounds for non-compliance with these principles. Any infringements will result in disciplinary measures.

The Code of Conduct is available on the Vontobel website: vontobel.com